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June 9, 2020

VIA ELECTRONIC FILING

Honorable J. Christian F. Hummel
United States Magistrate Judge
United States District Court
Northern District of New York
445 Broadway, Room 441
Albany, New York 12207

Re: *Jane Roe v. Union College, et al.*
Civil Case No.: 1:19-cv-00909 GLS-CFH

Dear Your Honor:

Please be advised, the undersigned represents the plaintiff, Jane Roe (hereinafter "Plaintiff") in the above-captioned matter. Pursuant to Your Honor's October 31, 2019 Order, I write together with counsel for Defendants, Michael Murphy, to advise the court of the status of discovery in this matter.

Currently, the parties are continuing to engage in written discovery and the exchange of documents. Counsel for the parties conferred regarding the status of discovery on June 8, 2020 and have come to the following agreement and understanding:

- i. On or about November 1, 2019, Plaintiff served her initial written discovery demands on Defendants' counsel. Defendants anticipate serving responses to Plaintiff's written discovery demands on or before July 3, 2020;
- ii. Defendants shall serve their initial disclosures, interrogatories, and requests for production on or before June 12, 2020;
- iii. Plaintiff anticipates serving responses to Defendants' interrogatories and requests for production on or before July 10, 2020;
- iv. Counsel for the parties have agreed that, to facilitate potential settlement, records related to Plaintiff's claimed damages including, but not limited to, her claim for emotional distress are necessary. Plaintiff shall provide authorizations for the release of her (i) medical and mental health records and (ii) academic records from subsequent universities, to Defendants' counsel on or before June 12, 2020.

Presently, this matter is scheduled for a mediation on July 17, 2020. The parties are committed to, to the best of their ability, exchanging any outstanding written discovery before the mediation in the hopes that such disclosure will assist in negotiations.

Counsel remains available should Your Honor have any questions or concerns.

Thank you.

Very truly yours,

NESENOFF & MILTENBERG, LLP

By: *Gabrielle M. Vinci*
Gabrielle M. Vinci, Esq.

CC: All Counsel (Via ECF)